

**CLARKSON LAW FIRM, P.C.**

Ryan J. Clarkson (SBN 257074)  
*rclarkson@clarksonlawfirm.com*  
Bahar Sodaify (SBN 289730)  
*bsodaify@clarksonlawfirm.com*  
Alan Gudino (SBN 326738)  
*agudino@clarksonlawfirm.com*  
Ryan D. Ardi (SBN 348738)  
*rardi@clarksonlawfirm.com*  
22525 Pacific Coast Highway  
Malibu, CA 90265  
Tel: (213) 788-4050  
Fax: (213) 788-4070

*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

JASON KHALILI, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

vs.

LINDT & SPRUNGLI (NORTH  
AMERICA) INC., LINDT &  
SPRUNGLI (USA) INC.,

Defendants.

Case No. 2:23-cv-02543-AB-AGR

*Judge: Hon. Andre Birotte Jr.*  
Complaint Filed: April 4, 2023

**PLAINTIFF'S NOTICE OF  
VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE PURSUANT  
TO FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)**

1 PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure  
2 41(a)(1)(A)(i), Plaintiff Jason Khalili, by and through his counsel Ryan J. Clarkson,  
3 Bahar Sodaify, Alan Gudino, and Ryan D. Ardi of Clarkson Law Firm, P.C., hereby  
4 voluntarily dismisses this action without prejudice in its entirety.

5 Defendants Lindt & Sprungli (North America) Inc. and Lindt & Sprungli  
6 (USA) Inc. ("Defendants") have not yet filed an answer or summary judgment in this  
7 action, therefore Defendants may be dismissed from this action without prejudice  
8 without an order from this Court.

9  
10 DATED: April 18, 2023

**CLARKSON LAW FIRM, P.C.**

11  
12 /s/ Bahar Sodaify  
13 Ryan J. Clarkson, Esq.  
14 Bahar Sodaify, Esq.  
15 Alan Gudino, Esq.  
16 Ryan D. Ardi, Esq.

*Attorneys for Plaintiff*